

EXHIBIT C

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

BLAKE LIVELY,

Movant,

v.

No. 3:25-mc-63

THE SKYLINE AGENCY LLC and ROZA
KALANTARI,

Respondents.

**BLAKE LIVELY’S MOTION TO TRANSFER TO THE SOUTHERN DISTRICT
OF NEW YORK PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 45(f)**

Movant Blake Lively hereby moves to transfer the motion to compel to the Southern District of New York pursuant to Federal Rule of Civil Procedure 45(f). This Motion is made on the following grounds:

1. In connection with an action pending in the Southern District of New York, Ms. Lively served subpoenas on each of the Respondents pursuant to Federal Rule of Civil Procedure 45. Both subpoenas specified a place of compliance in the Northern District of Texas. Ms. Lively accordingly filed her motion to compel production of privileged documents withheld from the Skyline Parties’ responses in the Northern District of Texas (the “Motion to Compel”).
2. Transfer to the issuing Court in the Southern District of New York is warranted under Federal Rule of Civil Procedure 45(f) because transfer will conserve party and judicial resources, avoid the risk of conflicting orders, aid the issuing court’s management of

discovery, and also because the benefits of transfer far outweigh any burden on Respondents.

This Motion is based on Ms. Lively's concurrently filed brief; all pleadings, records, and filings in the above-captioned case; all matters of which the Court shall take judicial notice; and on such argument as may be resented at any hearing on this Motion.

RELIEF SOUGHT

Ms. Lively respectfully requests that the Court enter an order transferring the Motion to Compel to the Southern District of New York pursuant to Federal Rule of Civil Procedure 45(f).

Dated: August 6, 2025

Respectfully submitted,
/s/ Samuel T. Mallick

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CERTIFICATE OF CONFERENCE

Counsel for Ms. Lively conferred with counsel for Respondents via email on July 31, 2025 and August 1, 2025, and counsel for Respondents informed counsel for Ms. Lively that they oppose this motion.

Dated: August 6, 2025

/s/ Samuel T. Mallick
Samuel T. Mallick
Attorney for Movant Blake Lively

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed via CM/ECF on August 6, 2025.

Notice of this filing and service will be sent in accordance with the Federal Rules of Civil Procedure.

Dated: August 6, 2025

/s/ Samuel T. Mallick
Samuel T. Mallick
Attorney for Movant Blake Lively

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[PROPOSED] ORDER

Upon consideration of the motion by Blake Lively to transfer this motion to compel to the Southern District of New York pursuant to Federal Rule of Civil Procedure 45(f), any opposition(s) thereto, and the entire record herein, it is hereby **ORDERED** that:

1. Blake Lively's motion to transfer is **GRANTED**.
2. This action is hereby **TRANSFERRED** to the United States District Court for the Southern District of New York.

SO ORDERED.

Signed on _____, 2025.
